

June XX, 2023

Dr. Earthea Nance, Regional Administrator
U.S. Environmental Protection Agency, Region 6
1201 Elm St., Suite 500
Dallas, TX 75270

Subject: Oklahoma's SO₂ Modeled Source Annual Report Required by 40 C.F.R. Part 51, Subpart BB, Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS

Dear Administrator Nance:

The Oklahoma Department of Environmental Quality (DEQ), as the air agency responsible for implementation of the 2010 SO₂ National Ambient Air Quality Standards (NAAQS) in Oklahoma, has previously submitted the list of sources in Oklahoma subject to the SO₂ Data Requirements Rule (DRR). 40 C.F.R. Part 51, Subpart BB. On July 12, 2016, EPA designated Choctaw County and Noble County as attainment/unclassifiable based on modeling submitted by DEQ. 81 Fed. Reg. 45039. On January 9, 2018, EPA designated Kay, Le Flore, and Rogers Counties as attainment/unclassifiable based on modeling submitted by DEQ. 83 Fed. Reg. 1098. These designations correspond to the following applicable sources subject to the DRR that are listed alphabetically by county:

EPA EIS ID	Company	Facility	County
8449511	WFEC	Hugo Generating Station	Choctaw
7420411	Continental Carbon	Ponca City Plant	Kay
8148711	AES Shady Point	Cogeneration Plant	Le Flore
8519411	OG&E	Sooner Generating Station	Noble
8212411	AEP/PSO	PSO Northeastern Power Station	Rogers

The purpose of this letter is to document the annual SO₂ emissions of these modeled sources and provide an assessment of the cause of any emissions increase, if applicable, from the previous year, per 40 C.F.R. § 51.1205(b). Please note that AEP/PSO-PSO Northeastern Power Station is no longer included in the tables below. EPA stated via letter on October 15, 2018, that DEQ is not required to submit an annual report for this source per 40 C.F.R. § 51.1205(c).

Annual SO₂ Emissions

Facility	Calendar Year		
	2012-2014 ¹	2021 ⁴	2022 ⁴
WFEC Hugo Generating Station	9,305 TPY ²	2,427 TPY	2,570 TPY
Continental Carbon Ponca City Plant	4,141 TPY ³	2,248 TPY	410 TPY
OG&E River Valley Generating Station (formerly AES Shady Point Cogeneration Plant)	3,379 TPY ³	636 TPY	776 TPY
OG&E Sooner Generating Station	14,780 TPY ²	572 TPY	494 TPY

¹ Three-year average of actual emissions used in modeling for the 2010 SO₂ 1-hour NAAQS designation.

² Based on modeling submitted September 18, 2015.

³ Based on modeling submitted January 13, 2017.

⁴ Actual emissions as reported in the Annual Emission Inventory.

DEQ annually collects emissions inventory data from these sources. As shown in the table above and the attached plant summaries, actual emissions from 2021 and 2022 are less than the three-year average emissions from 2012 to 2014 that were used to model the facilities to demonstrate attainment with the 2010 SO₂ 1-hour NAAQS. Annual SO₂ emissions from Continental Carbon Ponca City Plant decreased significantly in 2022, due to the removal and replacement of three (3) thermal oxidizers with two (2) Clean Gas and Energy Cogeneration Units (CGEU). WFEC Hugo Generating Station and OG&E River Valley Generating Station facilities reported slight emission increases from 2021 to 2022. These emission variations reflect normal fluctuations in operations from year-to-year such as the number of hours operated, type of fuel used, and units dispatched.

Pursuant to 40 C.F.R. § 51.1205(b)(1) and based on the emissions information provided, DEQ recommends no additional modeling or analysis of these sources at this time. Although annual emissions for calendar year 2022 minimally increased from 2021 for two of the sources, all of the emissions remain well below the quantities modeled for the SO₂ NAAQS compliance demonstrations. In summary, the data reviewed indicate that the areas surrounding the applicable sources are in attainment of the 2010 SO₂ 1-hour NAAQS.

The content of this letter was made available for public inspection and comment on DEQ's website from May XX, 2023, through June XX, 2023, which satisfies the requirement in 40 C.F.R. § 51.125(b). If you desire additional information, or you have any questions concerning this matter, please contact Ms. Cheryl E. Bradley, Data and Planning Manager, at 405-702-4157.

Sincerely,

Kendal Stegmann, Director of Air Quality Division
Oklahoma Department of Environmental Quality

cc: Ken McQueen, Secretary of Energy and Environment
Scott Thompson, Executive Director, Department of Environmental Quality
Carrie Paige, Infrastructure & Ozone Section, EPA R6
Theresa Alexander, Air Monitoring Section, EPA R6
Michael Feldman, Regional Haze and SO₂ Section, EPA R6

Attachments

1. 2021 Emissions Inventory Plant Summary for WFEC-Hugo
2. 2022 Emissions Inventory Plant Summary for WFEC-Hugo
3. 2021 Emissions Inventory Plant Summary for Continental Carbon-Ponca City
4. 2022 Emissions Inventory Plant Summary for Continental Carbon-Ponca City
5. 2021 Emissions Inventory Plant Summary for OG&E-River Valley
6. 2022 Emissions Inventory Plant Summary for OG&E River Valley
7. 2021 Emissions Inventory Plant Summary for OG&E-Sooner
8. 2022 Emissions Inventory Plant Summary for OG&E-Sooner